

Rebody 113 12/2/13 1 PM

Bruce, Bill, ^{consultant} John, Kent, ~~Eric~~ Eric Dir. Reg. Affairs

John says NOV was stuck

→ where is blasting now

→ what are future plans

→ What's different since Feb. 2013

John claims one reg cited as part of SIP

States compliance w/ NAAQS is prima facie evidence of no threat to human health

Kate - answers what on basis is

Snake - explains evolution of our case

Some back & forth on complaints, compliance

Bruce - more of a common relations problem than dust problem

Have made efforts to work w/ community

E.g. worked on employee traffic patterns, continue to H₂O

dust suppressants; have tried to create more barriers

like trees, berms

John talks more about other things they can do, asks for any comments/ concerns about FDP

Bruce believes mine managers are paying more attention to weather

Kent says they do have some op. flex. to delay blasting depending on weather → in FDP?

Me: Has active site moved?

Kent: yes but not much since Feb 2013

Stopped w/ ^{Section} E corner in summer of 2012

" " S strip " " 2013

Reclamation done on (E) & (S) - covered w/ soil, planted w/ legumes & grasses

Bill (consultant): makes his case re monitoring data

Argues didn't use right monitor (not equivalent method for SIP rule)

Bill also arguing that results can't be tied to mining activity
(Credible evidence?)

EPA has not certified any monitors for 1 hour sampling

Arguing we didn't use right sampling method

" gravel roads cause confounding values

John - they tested some filters & establish dust not from mine

Bill - after NOV, provided 4 filters* with T.D.'s, sent to K-9 lab,

Mine took a variety of samples e.g. roads, coal piles, pit

Found most dust was limestone = roads

More roads are shale → quartz, silica?

13% of material on filters was coal

John asks about wind speed on filter dates: 5-7, 4-6, 11, 2-6, 0-11.5
4 days, with wind

John raises drought conditions during 4 no. of monitoring

*All dates were Δ 50 days → (6/14, 6/20, 8/7, 9/29)

→ Did they blast every day? Yes

Overtuber is mostly clay, shale, silica, 3% limestone @ most

→ Do we want their sampling results?

→ Evidence of road dust complaints? Do we need that? - no

→ Did we analyze Δ 50 days w/ wrong wind direction - do statistical comparison? - no, rest of team thinks not a problem

CAUTIONS

Filters collect for 24 hr. - wind Δ, activities Δ e.g. blasts are discrete but traffic continuous?

We can pick some days for more filter analysis

POST Kahi asks for filter analysis, John will get back to her on that

Eric requests that we forward complaints vs issuing another NOV,

Bruce will be contact

→ John asks for specific dates of violations (Δ 50's)

Bill admit to dates of violation